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Hearing Date: June 26, 2012 at 10:00 a.m. Objection Deadline: June 8, 2012 at 4:00 p.m. Reply Deadline: June 15, 2012 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

FAIRFIELD SENTRY LIMITED, et al.,

Debtors in Foreign Proceedings.

FAIRFIELD SENTRY LIMITED, et al. (In Liquidation), acting by and through the Foreign Representatives thereof,

Plaintiffs,

V.

THEODOOR GGC AMSTERDAM, et al.,

Defendants.

This objection is submitted in the following Adversary Proceedings:

10-03635 10-03636 10-03753 10-03758 10-04095 10-03780 11-01250 11-01258 Chapter 15 Case

Case No. 10-13164 (BRL)

(Jointly Administered)

Adv. Pro. No. 10-03496

(Administratively Consolidated)

DECLARATION OF JENNIFER C. HALTER
IN OPPOSITION TO THE FOREIGN REPRESENTATIVE'S MOTION
SEEKING LIMITED RELIEF FROM ORDER STAYING REDEEMER ACTIONS
AND ENTRY OF ORDER DIRECTING DEFENDANTS TO MAKE
EXPEDITED INITIAL DISCLOSURES ON BENEFICIAL HOLDERS AND
AUTHORIZING AMENDMENT TO COMPLAINT IN REDEEMER ACTIONS

Jennifer Colgan Halter, pursuant to 28 U.S.C. § 1746, declares as follows:

- 1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel for defendants UBS Fund Services (Cayman) Limited, UBS Deutschland AG, UBS Fund Services (Ireland) Limited, UBS Jersey Nominees Limited, UBS Luxembourg SA, UBS AG New York, and UBS AG Zurich (together, the "UBS Defendants").
- 2. As an attorney admitted to practice before this Court, I respectfully submit this declaration to provide the Court with true and correct copies of the documents listed below that

are referenced in the Opposition of the UBS Defendants to the Foreign Representative's Motion Seeking Limited Relief from Order Staying Redeemer Actions and Entry of Order Directing Defendants to Make Expedited Initial Disclosures on Beneficial Holders and Authorizing Amendment to Complaint in Redeemer Actions, dated June 8, 2012.

- 3. Annexed hereto as **Exhibit A** is a true and correct copy of American Bar Association Resolution 103 passed on February 26, 2012.
- 4. Annexed hereto as **Exhibit B** is a true and correct copy of the American Bar Association Section of International Law's Report to the House of Delegates regarding Resolution 103.
- 5. Annexed hereto as **Exhibit C** is a true and correct copy of the Cayman Islands Confidential Relationships (Preservation) Law (2009 Revision).
- 6. Annexed hereto as **Exhibit D** is a true and correct copy of *In re Bankamerica*Trust and Banking Corp., 1992-93 CILR 574 (Grand Court Nov. 5, 1993) (Harre, C.J.)
- 7. Annexed hereto as **Exhibit E** is a true and correct copy of *In re Bank of Credit* and Commerce International (Overseas) Ltd. (in liquidation), 1994-95 CILR 56 (Grand Court Jan. 26, 1994) (Harre, C.J.).
- 8. Annexed hereto as **Exhibit F** is a true and correct copy of the German Data Protection Act (Bundesdatenschutzgesetz).
- 9. Annexed hereto as **Exhibit G** is a true and correct copy of Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, adopted by the European Union on July 24, 1995.

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10. Annexed hereto as **Exhibit H** is a true and correct copy of the Irish Data Protection (Amendment) Act of 2003.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2012.

Jennifer C. Halter
Jennifer C. Halter